

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
Richmond Division

IN RE:)	
)	
STEPHEN DAVID TURNER JR.)	Case No. 19-30883-KLP
)	
Debtor)	

**SECOND MOTION FOR EXTENSION OF TIME FOR FILING
AMENDED CHAPTER 13 PLAN AND RELATED MOTIONS**

COMES NOW the Debtor, by counsel, and files this Motion to extend the time for the filing of Debtor's Amended Chapter 13 Plan and Related Motions, and in support hereof states unto the Court as follows:

1. On or about December 4, 2019 the Court sustained an objection to the Debtor's original Chapter 13 Plan.
2. Pursuant to LBR 3015-2, the Debtor's Amended Chapter 13 Plan is due December 26, 2019 and the date was extended by court order to January 9, 2020.
3. Debtor's counsel needs additional time to meet with the Debtor to prepare and file an amended Chapter 13 plan.

WHEREFORE, the Debtor respectfully requests that the Court enter an Order extending the time for the filing of Debtor's Amended Chapter 13 Plan and Related Motions and for such other relief as the Court may deem appropriate.

James E. Kane (VSB# 30081)
KANE & PAPA, P.C.
P. O. Box 508
Richmond, Virginia 23218-0508
Telephone (804) 225-9500
Counsel for Debtor

Respectfully submitted,

STEPHEN DAVID TURNER JR.
By Counsel

/s/ James E. Kane
James E. Kane (VSB# 30081)
KANE & PAPA, P.C.
P. O. Box 508
Richmond, Virginia 23218-0508
Telephone (804) 225-9500
Counsel for Debtor

CERTIFICATE OF SERVICE

I hereby certify that on January 9, 2020, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all parties registered to receive notice thereof and to all creditors and parties in interest on the attached mailing matrix.

/s/ James E. Kane
James E. Kane

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)	
Debtor)	

NOTICE OF MOTION AND HEARING

The above Debtor has filed a Motion to extend the time for the filing of Debtor's Amended Chapter 13 Plan and Related Motions.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then you or your attorney must:

- File with the court, at the address shown below, a written request for a hearing [or written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for a hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above, to:

Clerk of Court
United States Bankruptcy Court
701 East Broad Street
Richmond, VA 23219

You must also mail a copy to:

James E. Kane, Esquire
Kane & Papa, P.C.
1313 East Cary Street
Richmond, Virginia 23219

- Attend a hearing scheduled for January 29, 2020 at 701 East Broad Street, Room 5000, Richmond, VA. If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Respectfully submitted,

STEPHEN DAVID TURNER JR.
By Counsel

/s/ James E. Kane
James E. Kane (VSB# 30081)
KANE & PAPA, P.C.
P. O. Box 508
Richmond, Virginia 23218-0508
Telephone (804) 225-9500
Counsel for Debtor

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/s/ James E. Kane
James E. Kane

CASE INFO

LABEL MATRIX FOR LOCAL NOTICING
04223
CASE 19-30883
EASTERN DISTRICT OF VIRGINIA
RICHMOND
FRI FEB 22 11-05-21 EST 2019

AMERICAN ANESTHESIOLOGY OF VA
ATTN BANKRUPTCY
PO BOX 535386
ATLANTA GA 30353-5321

BANK OF AMERICA
4909 SAVARESE CIRCLE
FL1-908-01-50
TAMPA FL 33634-2413

BON SECOURS
PO BOX 409601
ATLANTA GA 30384-9601

CAPITAL ONE
ATTN BANKRUPTCY
PO BOX 30285
SALT LAKE CITY UT 84130-0285

CBE GROUP
PO BOX 2635
WATERLOO IA 50704-2635

CHRIS WELL INSTALLER
7518 BELMONT STAKES DR
MIDLOTHIAN VA 23112-6125

DINWIDDIE COUNTY TREASURER
14016 BOYDTON PLANK ROAD
DINWIDDIE VA 23841-2500

DINWIDDIE COUNTY TREASURER
P O BOX 178
DINWIDDIE VA 23841-0178

DIVISION OF CHILD SUPPORT ENFORCEMENT
BANKRUPTCY UNIT
2001 MAYWILL STREET STE 200
RICHMOND VA 23230-3236

JOHN P FITZGERALD III
OFFICE OF THE US TRUSTEE REGION 4 R
701 E BROAD STREET STE 4304
RICHMOND VA 23219-1849

GREAT AMERICAN FINANCE
ATTN BANKRUPTCY
20 N WACKER DR SUITE 2275
CHICAGO IL 60606-1294

~~EXCLUDE~~

~~JAMES E KANE
KANE PAPA PC
1313 EAST CARY STREET
PO BOX 500
RICHMOND VA 23218-0500~~

PROFESSIONAL ACCOUNT MGMT LLC
PO BOX 785
MILWAUKEE WI 53201-0785

RAINBOW REALTY
105 CHISMAN CIRCLE
SEAFORD VA 23696-2627

SOUTHSIDE ELECTRIC COOP
ATTN BANKRUPTCY
1712 W VIRGINIA AVE
CREWE VA 23930-1049

ST MARYS HOSPITAL
P O BOX 409553
ATLANTA GA 30384-9553

TTFROS14
PO BOX 1280
OAKS PA 19456-1280

TOUCHSTONE BANK
800 N MECKLENBURG AVE
SOUTH HILL VA 23970-1522

TRANSWORLD SYS
500 VIRGINIA DR
STE 514
FORT WASHINGTON PA 19034-2707

DEBTOR
STEPHEN DAVID TURNER JR
3283 OLD NOTTOWAY RD
BLACKSTONE VA 23824-4041

UST SMG RICHMOND
OFFICE OF THE U S TRUSTEE
701 EAST BROAD ST SUITE 4304
RICHMOND VA 23219-1849

VECTOR SECURITY
2805 NORTH PARHAM ROAD
SUITE 500
HENRICO VA 23294-4453

VERIZON BK
3601 CONVERSE DR
WILMINGTON NC 28403-6182

VERIZON WIRELESS
PO BOX 25505
LEHIGH VALLEY PA 18002-5505

VIRGINIA CREDIT UNION
ATTN BANKRUPTCY
PO BOX 90010
RICHMOND VA 23225-9010

VIRGINIA CU
ATTN BANKRUPTCY DEPARTMENT
PO BOX 90010
RICHMOND VA 23225-9010

VIRGINIA CU
PO BOX 90010
RICHMOND VA 23225-9010

VIRGINIA DEPT OF TRANSPORT BK
1401 E BROAD STREET
RICHMOND VA 23219-2000